

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GUN OWNERS OF AMERICA, INC.,  
et al.,

Plaintiffs,

Case No. 1:18-cv-01429  
Hon. Paul L. Maloney

v.

MATTHEW WHITAKER, et al.,

Defendants.

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EXPEDITED CONSIDERATION REQUESTED

**PLAINTIFFS' MOTION FOR ORDER GRANTING PERMISSION TO BRING  
SECURED OPERABLE BUMPSTOCK FIREARM TO HEARING**

NOW COME Plaintiffs, GUN OWNERS OF AMERICA, INC., GUN OWNERS FOUNDATION, VIRGINIA CITIZENS DEFENSE LEAGUE, MATT WATKINS, TIM HARMSSEN and RACHEL MALONE, by and through their Attorneys, PENTIUK, COUVREUR & KOBILJAK, P.C., and for their Expedited Motion for Order Granting Permission to Bring a Secured Operable Bumpstock Firearm to Hearing, state as follows:

1. The hearing on Plaintiffs' Motion for Preliminary Injunction is scheduled for March 6, 2019, before this Honorable Court.
2. Plaintiffs' request permission to bring to the hearing a secured bumpstock equipped unloaded semi automatic firearm to use as a visual aid at the hearing. The firearm will be unloaded and encased, presented to the Marshalls and transported by them to and from the Court room. No ammunition will be present.
3. Defendants were requested to concur in this motion. Defendants state that they do not believe that it is necessary to introduce an operable firearm to the courtroom for purposes

of this hearing. However, Defendants take no position on this motion, provided that Plaintiffs work with the Court and its personnel to ensure that appropriate security measures are implemented in connection with Plaintiffs' proposal.

WHEREFORE, Plaintiffs respectfully request this Honorable Court grant Plaintiffs' Motion and issue an Order permitting Plaintiffs to work with Court security in order to bring a secured bumpstock equipped unloaded semi automatic firearm to use as a visual aid at the hearing of March 6, 2019.

Respectfully submitted,  
**PENTIUK, COUVREUR & KOBILJAK, P.C.**

By: /s/ Kerry L. Morgan  
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*Of Counsel*

Dated: March 4, 2019.

**CERTIFICATE OF SERVICE**

Karen Zurbo-Miller, is employed by PENTIUK, COUVREUR & KOBILJAK, P.C., and on March 4, 2019, e-filed and served Plaintiffs Expedited Motion for Order Granting Permission

to Bring Secured Operable Bumpstock Firearm to Hearing using this Court's e-filing and e-service system.

/s/ Karen Zurbo-Miller  
Karen Zurbo-Miller, Legal Assistant

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